



April 6, 2012

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Via Electronic Filing

Re: Notice of Ex Parte Presentation in Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations, MM Dkt. 00-168; Standardizing Program Reporting Requirements for Broadcast Licensees, MB Dkt. 11-189

Dear Ms. Dortch,

Pursuant to section 1.1206(b) of the Commission's rules, Free Press submits this notice regarding an *ex parte* communication in the above referenced dockets.

On April 4, 2012, Corie Wright, Free Press Senior Policy Counsel, met with Lyle Elder, Special Counsel to Chairman Genachowski.

In the meeting I expressed Free Press's support for the Commission's proposal to replace broadcasters' paper public files with an online public file that would be hosted by the Commission, as well as the proposals to require broadcasters to disclose their shared services and other resource sharing arrangements, and to submit a record of "pay for play" arrangements for inclusion in their online public files.

I explained that online public access to television stations' political files is critical regardless of the designated market area in which a station is located. Contentious elections and other controversial issues of public importance take place in all markets, regardless of their size or geographic location. Transparency and disclosure are as important to smaller communities as they are to larger ones. Exempting some licensees from the online posting requirement based on market size could result in arbitrary line drawing by the Commission and would unjustifiably deny ready access to this critical information in the very communities that need it the most.

I also explained that, in any event, exemptions from the online public file requirements are unnecessary because broadcaster estimates of the time and cost burden of maintaining their political files online are grossly exaggerated, if not outright wrong. The vast majority of estimates submitted by broadcasters treat the online posting requirement as it were an extra task rather than a replacement for existing filing obligations. The FCC's proposed online posting requirement is *in lieu of* – not in addition to – the time station

staff must already spend organizing their paper files. The FCC is not proposing that broadcasters report any additional information in their political files. It is simply proposing that broadcasters replace their outdated paper files with electronic ones that can be more easily accessed by the public. Contrary to broadcasters' assertions, they would not need to hire additional staff in order to make their political files available online; instead, current staff would substitute their existing paper file maintenance tasks with online ones.

Broadcasters have not provided a reasoned or legitimate explanation for why maintaining an online political file entails more burdens or requires more staff time than is already expended to maintain the existing paper file. In 2012 it is ludicrous for broadcasters to deny the efficiency advantages gained from switching from paper files to electronic ones. Indeed, many broadcasters admit that they already maintain these records in electronic form – an online public file would streamline the filing process by eliminating the burden of printing out these documents and organizing them by-hand in the existing paper file. It would also eliminate the staff time dedicated to supervising visitors inspecting the paper file, a not insignificant undertaking, particularly during the election season when stations receive numerous visitors seeking to inspect the political file.

Finally I renewed Free Press's support for the Commission's proposal to include "pay for play" records and resource sharing agreements in the online public file. I also urged the Commission to move expeditiously on issuing an NPRM in the agency's ongoing proceeding to replace broadcasters' issues/programs lists with a more streamlined and uniform reporting requirement.

In accordance with the Commission's rules, this *ex parte* notice is being filed electronically in the above referenced dockets. If you have any questions regarding this filing please do not hesitate to contact me.

Respectfully
submitted,
_____/s/_____
Corie Wright
Senior Policy Counsel
Free Press
202-265-1490

Cc:
Lyle Elder